

Appl. No. 10/629232
Amdt Dated April , 2006
Reply to Office Action March 8, 2006

REMARKS

Claims 1-7 & 9-16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Bright (US PN 5833472) in view of Katsui (US PN 6487079 B2), further in view of Perugini et al. (US PN 5396402). Applicant disagrees with the rejection and traverses as follows.

The previously presented claims 1 and 12, restrict that the retention module defines an opening therein, and the heat sink has a base which is received in the opening. In contrary, Bright and Perugini et al. references all disclose the heat sinks 50, 30 being seated on a top surface of the package holder 30, socket 38 without the base (bottom portion of the heat sink 50), the base portion 34 being received in the openings of the package holder 30, socket 38 (particularly see FIGS. 1-4 of Bright reference and FIGS. 1-4, 6 and 8 and lines 56-59, Col. 2 of Perugini et al. reference). Accordingly, the alleged combination of the cited Bright and Perugini et al. references cannot obtain the claimed subject matter of claims 1 and 12; thus, claims 1 and 12 are patentable over the cited Bright and Perugini et al. references.

Furthermore, Applicant cannot agree with Examiner's allegation that it would have been obvious to a person skilled in the art to replace the threaded fasteners 80 of Bright with the cover 60 of Katsui to obtain the claimed subject matter of claims 1 and 12.

The cover 60 of Katsui cannot be interpreted as the clip of claims 1 and 12. The clip, according to either a dictionary or the specification of the

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present application is a device for gripping. The clip grips and presses the heat sink by its nature when the clip cooperates with the retention module. In contrary, the cover 60 of Katsui presses the heat sink 50 by the help of screws 70 extending through the cover 60 and screwing into the guide member 30. Should the threaded fasteners 80 of Bright be replaced by the cover 60 of Katsui, the heat sink 50 thereof cannot be pressed by the cover 60 against the electronic package 2. The alleged combination cannot obtain the claimed subject matter of claims 1 and 12; thus, claims 1 and 12 are not obvious over Examiner's alleged combination.

For the allegation that the cover 62 of Katsui replaces the threaded fasteners 80 of Bright, there lacks a motive to do so. If the threaded fasteners 80 are removed, the internally threaded bores 17 of the retention sections 16 of Bright must also be removed, the holder 20 of Bright must be modified to be formed with the resting portion 31D of Katsui to receive the engaging pawls 62B of the cover 62 of Katsui, and the cover 62 of Katsui must be totally redesigned in order to be adapted the heat sink 50 of Bright which is much larger than the electronic package 2 and holder 20 thereof. It is not obvious for a person skilled in the art to make so many changes to Bright in view of the cover 62 of Katsui in order to obtain the present invention, except a hindsight combination. However, a hindsight combination cannot be a ground in rejecting an invention under 35 USC 103. In conclusion, for the alleged combination of Bright with the cover 62 of Katsui, Bright and Katsui fail to provide a suggestion of motivation to make such a combination. It is insufficient that the prior arts show similar

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components, unless the prior arts also contain some teaching, suggestion, or incentive for arriving at the claimed structure. The cited Bright and Katsui do not contain such teaching, suggestion or incentive for arriving Examiner's alleged combination; thus, claims 1 and 12 of the present invention are not obvious over the alleged combination.

Claims 2-7, 9-11 and 13-15 are also patentable since each of them includes the patentable features of the respective independent claim.

With respect to claim 3, the feature that the blocking portions of the pins **abut against** the retention module is disclosed. It can be understood, in order to fasten the retention module to the printed circuit board of the present invention, the blocking portions of the pins must exert a force on the retention module to bring it toward the printed circuit board. However, in Bright reference, lines 1-3, Col 4, disclose "Each of the inserts 12 has a retention section 16 which is receivable in a respective hole 33 in the holder 30 with a **slip fit**"; from this, it is understood that the retention section 16 of Bright does not abut against the holder 30 to exert a force to the holder 30 and bring it toward the printed circuit board 8. Accordingly, the Bright reference does **not** teach the features of claim 3, i.e., the blocking portions of the pins of the present invention **abutting against** the retention module. So, claim 3 has more patentable weight.

By the similar reasons in connection with claims 1 and 12, claim 16 is not taught by the alleged combination of the cited Bright, Katsui and Perugini et al. references; thus, claim 16 is patentable over the references in

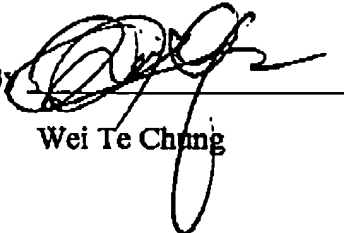
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record.

In view of the foregoing, the subject application as claimed in the pending claims is in a condition for allowance and an action to such effect is earnestly solicited.

Respectfully submitted,

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